

**REMARKS**

Claims 1, 3-11 and 13-22 are all the claims pending in the application. No amendments are being made to the claims.

**EXAMINER'S INTERVIEW**

Applicants thank the Examiner for courtesies extended to Applicants during the interview, which took place between the Examiner and Applicants' representative on August 18, 2008. In view of the argument presented by the Applicants' representative during interview, the Examiner has agreed to withdraw the final rejection. The summary of the aforesaid arguments is presented below.

**CLAIM REJECTIONS BASED ON 35 U.S.C. § 103**

The Examiner has rejected 1, 3-11 and 13-22 as being allegedly unpatentable over Shriberg et al. (Can Prosody Aid the Automatic Classification of Dialog Acts in Conversational Speech?) in view of Chino (5,761,637) and Dahlback et al. (Empirical Studies of Discourse Representations for Natural Language Interferences). Applicants respectfully traverse this rejection in view of the following arguments.

Claim 1, recites a feature of the invention "wherein the predictive model of discourse functions is operable to predict a likelihood of a first portion of a speech utterance being associated with a command directed at an application and a second portion of the speech utterance being associated with content being provided to the application." Independent claims 11, 21, and 22 recite generally similar limitations. Applicants respectfully submit that none of the Dahlback et al., Shriberg et al. and Chino, taken alone or in combination, teach or suggest the limitation of "wherein the predictive model of discourse functions is operable to predict a likelihood of a first portion of a speech utterance being associated with a command directed at an

application and a second portion of the speech utterance being associated with content being provided to the application,” which is specifically recited in the independent claim 1, and similarly recited in independent claims 11, 21 and 22.

In more detail, the Dahlback reference, cited by the Examiner, discloses an interface module in the form of a question-answering system. It should be emphasized that the question-answering system described in Dahlback does not have any dialogue handling capabilities. The purpose of such a module is to take in user input and execute based on the assumption that there is enough information available in the user’s utterance (Dahlback p. 292). The Examiner has construed this module of Dahlback to be allegedly covered by the limitation of “wherein the predictive model of discourse functions is operable to predict a likelihood of a first portion of a speech utterance being associated with a command directed at an application and a second portion of the speech utterance being associated with content being provided to the application,” specifically recited in claim 1 and as similarly recited in claims 11, 21 and 22. Applicants respectfully contest the aforesaid Examiner’s interpretations of the teachings of Dahlback.

Specifically, the Examiner had conceded during the interview that the Dahlback reference does not actually teach the limitation of “wherein the predictive model of discourse functions is operable to predict a likelihood of a first portion of a speech utterance being associated with a command directed at an application and a second portion of the speech utterance being associated with content being provided to the application” as recited in claim 1 and as similarly recited in independent claims 11, 21 and 22. Instead, the system in Dahlback merely executes based on the assumption that there is enough information in the user input, and, therefore, it does not do any predictions with respect to the likelihood that a first portion of speech is associated with a command. In addition, the system of Dahlback does not do any predictions with respect

to a second portion being associated with content being provided in the application as recited in the pending independent claims. Thus, it appears that the goal of Dahlback was NOT to develop a discourse model, but instead to find the simplest possible usable model for natural language interface applications. Accordingly, as the Examiner conceded during the interview, Dahlback fails to teach or suggest the feature of the invention “wherein the predictive model of discourse functions is operable to predict a likelihood of a first portion of a speech utterance being associated with a command directed at an application and a second portion of the speech utterance being associated with content being provided to the application,” recited in claim 1 and similarly recited in independent claims 11, 21 and 22.

The remaining two references, Shriberg et al. and Chino are cited by the Examiner for the alleged teachings of other claim elements, and, therefore, they do not remedy the identified deficiency of Dahlback et al.

Therefore, without admitting that the cited references teach or suggest any other elements of the pending claims, Applicants respectfully submit that none of the Dahlback et al., Shriberg et al. and Chino, taken alone or in combination, teach or suggest the limitation of “wherein the predictive model of discourse functions is operable to predict a likelihood of a first portion of a speech utterance being associated with a command directed at an application and a second portion of the speech utterance being associated with content being provided to the application” generally recited in the independent claims 1, 11, 21 and 22. For this reason, the cited prior art fails to teach or suggest all the limitations of claims 1, 11, 21 and 22 and, therefore, these claims are not unpatentable over Dahlback et al., Shriberg et al. and Chino.

With respect to the rejection of the remaining dependent claims 3-10 and 13-20, while continuing to traverse the Examiner’s characterization of the teachings of the references used by

**RESPONSE UNDER 37 C.F.R. § 1.116**  
U.S. Appln. No.: 10/781,443

Attorney Docket No.: CQ10217

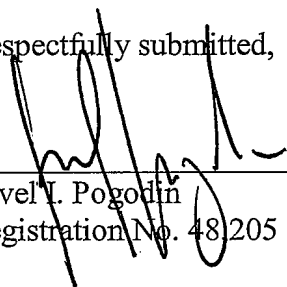
the Examiner in rejecting these claims, Applicants respectfully submit that these claims are patentable by definition, by virtue of their dependence upon their respective patentable independent claims 1 and 11.

**CONCLUSION**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

  
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